

**IN THE UNITED STATE DISTRICT COURT**  
**FOR THE WESTERN DISTRICT OF MISSOURI**  
**SOUTHERN DIVISION**

MONICA DANIEL HUTCHISON, )  
                                  )  
                                  )  
Plaintiff,                   )                                   Case No.: 09-3018-CV-S-RED  
vs.                            )  
                                  )  
                                  )                                   Jury Trial Demanded  
TEXAS COUNTY, MISSOURI;     )  
MICHAEL R. ANDERSON,        )  
TEXAS COUNTY PROSECUTING    )  
ATTORNEY; and                )  
MICHAEL R. ANDERSON, individually )  
                                  )  
Defendants.                   )

**NOTICE OF DEPOSITION**

**TO:**                           Corey L. Franklin  
                                  The Lowenbaum Partnership, LLC  
                                  222 South Central Avenue, Ste. 901  
                                  St. Louis, MO 63105

Warren E. Harris  
Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP  
3315 East Ridgeview, Ste. 1000  
Springfield, MO 65804

**TIME AND DATE:**           Wednesday July 14, 2010 at 10:00 a.m.

**PLACE DEPOSITION**           8000 Bonhomme Ave., Ste. 319  
**TO BE TAKEN:**               St. Louis, MO 63105

**WITNESS TO BE DEPOSED:**   Elizabeth F. Pribor, M.D.

**COURT REPORTER:**            JoAnn Richardson  
                                  20051 State Rt. B  
                                  St. James, MO 65559

**PURPOSE OF DEPOSITION:**   All matters relevant to the discovery and/or subject of the  
   above-entitled cause of action.

**DOCUMENTS TO BE  
PRODUCED:**

All documents reflecting the percentage of her income that Dr. Pribor derives from providing expert witness services, as well as documents containing financial information relating to expert services performed by Dr. Pribor on behalf of Defendant's counsel and other cases from Defense counsel retained by State Farm Insurance Company from January 1, 2006 through July 14, 2010.

Please take notice that at the above time, date and place, we shall cause the deposition of the above witness to be taken upon oral examination pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a shorthand reporter and a suitable Notary Public.

Any party or their attorney may appear and participate as they see fit.

Respectfully Submitted,

STEELMAN, GAUNT & HORSEFIELD

By: /s/ Stephen F. Gaunt  
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Stephen F. Gaunt MO Bar #33183  
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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I, Stephen F. Gaunt, hereby certify that on the 7<sup>th</sup> day of July, 2010 the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to:

Corey L. Franklin  
Ivan L. Schraeder  
The Lowenbaum Patnership, LLC  
222 South Central Avenue, Ste. 901  
St. Louis, MO 63105  
Counsel for Defendant Texas County, Missouri

Warren E. Harris  
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Counsel for Defendant Michael Anderson

/s/ Stephen F. Gaunt  
Stephen F. Gaunt